

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell  
and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy  
Manzelli and Chad Turmelle,

Plaintiffs,

v.

Civil Action No. 1:24-cv-00251

Frank Edelblut, *in his official capacity as Commissioner of  
the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro,  
Rajesh Nair, James Fricchione, and James Laboe, *in their  
official capacities as members of the New Hampshire  
State Board of Education;*

Pemi-Baker Regional School District;

Pembroke School District;

Donald J. Trump, *in his official capacity as President of  
the United States*, 1600 Pennsylvania Ave. NW,  
Washington, DC 20220;

U.S. Department of Justice, 950 Pennsylvania Ave. NW,  
Washington, DC 20530;

Pamela Bondi, *in her official capacity as Attorney General  
of the United States*, 950 Pennsylvania Ave. NW,  
Washington, DC 20530;

U.S. Department of Education, 400 Maryland Ave. SW,  
Washington, DC 20202; and

Denise L. Carter, *in her official capacity as Acting  
Secretary of the United States Department of Education*,  
400 Maryland Ave. SW, Washington, DC 20202.

**UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO MOTION TO  
INTERVENE**

1. On Friday, February 21, 2025 Female Athletes United (“FAU”) filed a motion to intervene in this case as defendants. Plaintiffs’ objection is currently due March 7.
2. Plaintiffs require a modest extension to time, until March 28, 2025 to prepare a response to this motion, due to previously scheduled counsel’s previously-scheduled personal leave and competing professional obligations.
3. Counsel for FAU indicates that they take no position on this motion. The State Defendants take no position on this motion.
4. The Pemi-Baker Defendants and the Pembroke Defendants assent.
5. The Federal Defendants have not yet appeared, so counsel has not sought their position on this motion.
6. No currently scheduled trial or hearing will be delayed by the granting of this motion.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs request that this Court grant the following relief:

- A. Extend the time for Plaintiffs to respond to FAU’s Motion to Intervene until March 28, 2025; and
- B. Grant such other and further relief as the Court deems just and proper.

February 26, 2025

Respectfully submitted,

PARKER TIRRELL, by her parents and  
next friends SARA TIRRELL and  
ZACHARY TIRRELL,

and

IRIS TURMELLE, by her parents and next  
friends AMY MANZELLI and CHAD  
TURMELLE,

By and through their attorneys,

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\*Admitted *pro hac vice*.

**CERTIFICATE OF SERVICE**

I certify that on this date, I filed the foregoing though ECF which caused a copy to be served on all counsel who have appeared. I further certify that I sent a courtesy copy to the United States Attorney's Office.

/s/ Henry Klementowicz  
Henry Klementowicz